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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

**DAVID NORMAN and WALTER ROMAS,** )  
individually, and on behalf of a class of others )  
similarly situated, )

**CV. 07-6028-TC**

Plaintiffs, )

**JOINT MOTION TO EXTEND  
TIME TO CONDUCT RULE 26(f)  
CONFERENCE**

v.

**DELL INC., a Texas corporation; and DELL** )  
**CS, L.P., a Texas limited partnership,** )

Defendants. )

**LR 7.1 CERTIFICATION**

The undersigned certify that counsel for the parties conferred prior to the filing of this motion, and that counsel for all parties join in this motion. This motion is made in good faith

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and not for the purpose of delay.

**MOTION**

Pursuant to L.R. 16.3, the parties respectfully request a brief extension of time to conduct the Fed. R. Civ. P. 26(f) conference. The Court's Discovery and Pretrial Scheduling Order requires the parties to conduct the Rule 26(f) discovery conference within thirty (30) days after service on all defendants. The present deadline for conducting the Rule 26(f) conference is March 22, 2007. By Order dated today, the Court scheduled the Rule 16 conference for April 9, 2007. The parties have conferred and April 2 or 3, 2007 is the earliest available date to conduct the Rule 26(f) conference due to preexisting scheduling conflicts. Accordingly, the parties request a fourteen (14) day extension of time, from March 22, 2007 until and including April 5,

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2007, within which to conduct the Rule 26(f) conference.

This joint motion is supported by the Declaration of Brenda K. Baumgart filed herewith.

DATED this 21<sup>st</sup> day of March, 2007.

BARRAN LIEBMAN LLP

By /s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of March 2007, I served the foregoing JOINT MOTION TO EXTEND TIME TO CONDUCT RULE 26(f) CONFERENCE on the following parties at the following addresses:

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**ATTORNEYS FOR PLAINTIFFS**

By causing the same to be:  mailed  hand delivered  faxed  emailed to them a true and correct copy thereof.

/s/  
Brenda K. Baumgart